

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

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SARAH H. BLACK and
KATHERINE BLACK on behalf
of her minor children D.B. and J.B.,

Plaintiffs,

16-CV-01238 (CBA)(ST)

-against-

**DECLARATION IN SUPPORT
OF DEFENDANTS' JOINT
MOTION TO STAY**

ANTHONY DAIN, CHERIE WRIGLEY,
IRA SALZMAN, MELISSA COHENSON,
BRIAN A. RAPHAN, P.C. PAMELA KERR,
ESAUN G. PINTO, AND CPI INVESTIGATIONS,

Defendants.

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Robert M. Fantone, declares under penalties of perjury:

1. I am associated with the law firm of Mancilla & Fantone, LLP, attorneys for Defendants CHERIE WRIGLEY, ESAUN G. PINTO, and CPI INVESTIGATIONS INC. As such, I am fully familiar with the facts hereinafter stated.
2. I submit this Declaration in support of Defendants' joint motion to stay the instant proceedings.
3. Annexed hereto as **Exhibit A** is a true and accurate copy of the Denver Probate Court Order dated April 27, 2018.
4. Annexed hereto as **Exhibit B** is a true and accurate copy of the Denver Probate Court Order dated June 29, 2018, which denied Bernard Black's request to stay the April 27, 2018 Order pending resolution of his appeal. Thus, the April 27, 2018 Order will remain in effect pending the resolution of Plaintiffs' appeals in Colorado.

5. For the reasons set forth in the accompanying Memorandum of Law, fully incorporated as if set forth herein, Defendants respectfully request this Honorable Court to stay the instant proceedings pending the resolution of Plaintiffs' appeals in Colorado, as well as any other or further relief the Court deems just and appropriate.

6. I declare under penalty of perjury that the foregoing is true and correct.

Dated: New York, New York
July 9, 2018

Respectfully submitted,

Mancilla & Fantone, LLP

By: /s/ Robert M. Fantone
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